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51 **UNITED STATES DISTRICT COURT
52 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

53 CHASOM BROWN, MONIQUE
54 TRUJILLO, WILLIAM BYATT, JEREMY
55 DAVIS, and CHRISTOPHER CASTILLO,
56 individually and on behalf of all similarly
57 situated,

58 Plaintiffs,

59 v.

60 GOOGLE LLC,
61 Defendant.

62 Case No. 4:20-cv-03664-YGR-SVK

63 **JOINT STIPULATION AND [PROPOSED]
64 ORDER EXTENDING TIME FOR
65 GOOGLE TO SUBMIT DECLARATION
66 IN SUPPORT OF PLAINTIFFS' MOTION
67 TO SEAL (DKT. 608)**

68 Judge: Hon. Yvonne Gonzalez Rogers

1 Pursuant to Civil Local Rule 6-2 and 7-12, this joint stipulation is entered into between
 2 Plaintiffs and Google LLC (“Google”), collectively referred to as the “Parties.”

3 WHEREAS, on June 21, 2022, Plaintiffs filed their Administrative Motion to File Under
 4 Seal Portions of Plaintiffs’ Motion for Class Certification (“Motion to Seal”) (Dkt. 608);

5 WHEREAS, on June 21, 2022, Google received unredacted copies of Plaintiffs’ Motion to
 6 Seal and exhibits, approximately 90 of which contain material designated “Confidential” or “Highly
 7 Confidential – Attorneys’ Eyes Only” by Google to be sealed and submitted with Dkt. 608;

8 WHEREAS, pursuant to Civil Local Rule 79-5(e), the deadline for Google, as the
 9 Designating Party to portions of Plaintiffs’ Motion to Seal (Dkt. 608), to establish that such
 10 designated material is sealable, is Monday, June 27, 2022;

11 WHEREAS, the Parties agree that an extension of the deadline to Wednesday, July 27, 2022
 12 will provide Google with sufficient time to respond to Plaintiffs’ Motion to Seal (Dkt. 608)

13 NOW THEREFORE, the Parties stipulate to extend the deadline by which Google shall
 14 submit a Declaration in support of Plaintiffs’ Motion to Seal (Dkt. 608), to Wednesday, July 27,
 15 2022.

16 DATED: June 27, 2022
 17

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19 /s/ Andrew H. Schapiro

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Attorneys for Plaintiffs

ATTESTATION OF CONCURRENCE

I am the ECF user whose ID and password are being used to file this JOINT STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR GOOGLE TO SUBMIT DECLARATION IN SUPPORT OF PLAINTIFFS' MOTION TO SEAL (DKT. 608). Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in the filing of this document.

Dated: June 27, 2022

By /s/ Andrew H. Schapiro

Andrew H. Schapiro

Counsel on behalf of Google

[PROPOSED] ORDER

Pursuant to stipulation of the Parties, the Court hereby **ORDERS**:

The deadline for Google to submit a Declaration in support of Plaintiffs' Motion to Seal (Dkt. 608), shall be extended to July 27, 2022.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

HON. YVONNE GONZALEZ ROGERS
United States District Court Judge